

EX. 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11,  
2001

03 MDL 1570 (GBD)  
ECF Case

**AFFIRMATION OF EVAN F. KOHLMANN**

I, Evan F. Kohlmann, being duly sworn, declare and state as follows:

1. My full name is Evan Francois Kohlmann. I am a private International Terrorism Consultant who specializes in tracking Al-Qaida and other contemporary terrorist movements. I hold a degree in International Politics from the Edmund A. Walsh School of Foreign Service (Georgetown University), and a Juris Doctor (professional law degree) from the University of Pennsylvania Law School. I am also the recipient of a certificate in Islamic studies from the Prince Alwaleed bin Talal Center for Muslim-Christian Understanding (CMCU) at Georgetown University.

2. I currently work as an investigator with the NEFA Foundation and as an on-air analyst for NBC News in the United States. I also run an Internet website Globalterroralert.com that provides information to the general public relating to international terrorism.

3. I am author of the book Al-Qaida's Jihad in Europe: the Afghan-Bosnian Network (Berg/Oxford International Press, London, 2004) which has been used as a teaching text in graduate-level terrorism courses offered at such educational institutions as Harvard University's Kennedy School of Government, Princeton University, and the Johns Hopkins School of Advanced International Studies (SAIS).

4. As part of my research beginning in approximately 1997, I have traveled overseas to interview known terrorist recruiters and organizers (such as Abu Hamza al-Masri) and to attend underground conferences and rallies; I have reviewed thousands of open source documents; and, I have amassed one of the largest digital collections of terrorist multimedia and propaganda in the world.

5. The open source documents in my collection include sworn legal affidavits, original court exhibits, video and audio recordings, text communiqués, eyewitness testimonies, and archived Internet websites.

6. I have testified on ten occasions as an expert witness in jurisdictions beyond the United States—including the United Kingdom, Denmark, Australia, and Bosnia-Herzegovina.

7. I have testified once as an expert witness in a U.S. civil case, Gates v. Syrian Arab Republic, before the U.S. District Court for the District of Columbia.

8. I have additionally testified as an approved expert witness in United States federal and military courts in fifteen criminal cases; including:

- United States v. Sabri Benkhala (Eastern District of Virginia, 2004)
- United States v. Ali Timimi (Eastern District of Virginia, 2005)
- United States v. Uzair Paracha (Southern District of New York, 2005)
- United States v. Ali Asad Chandia (Eastern District of Virginia, 2006)
- United States v. Yassin Aref (Northern District of New York, 2006)
- United States v. Sabri Benkhala (Eastern District of Virginia, 2007)
- United States v. Rafiq Sabir (Southern District of New York, 2007)
- United States v. Emadeddine Muntasser (District of Massachusetts, 2007)
- United States v. Hassan Abu Jihaad (District of Connecticut, 2008)
- United States v. Mohammed Amawi et al. (Northern District of Ohio, 2008)
- United States v. Salim Hamdan (Guantanamo Bay Military Commissions, 2008)

- United States v. Ali Hamza al-Bahlul (Guantanamo Bay Military Commissions, 2008)
- United States v. Mohamed Shnewer et al. (District of New Jersey, 2008)
- United States v. Oussama Kassir (Southern District of New York, 2009)
- United States v. Syed Haris Ahmed (Northern District of Georgia, 2009)
- United States v. Ehsanul Sadequee (Northern District of Georgia, 2009)

9. In United States v. Uzair Paracha, Federal District Judge Sidney Stein held a Daubert hearing on my qualifications as an expert witness and issued a ruling concluding: “Evan Kohlmann has sufficient education, training, and knowledge to be qualified as an expert, and... Kohlmann’s methodology—that is, his process of gathering sources, including a variety of original and secondary sources, cross-checking sources against each other, and subjecting his opinions and conclusions to peer review—is sufficiently reliable to meet the standards for admissibility of expert testimony set by the Federal Rules of Evidence.”

10. Likewise, in United States v. Hassan Abu Jihaad, Federal District Judge Mark Kravitz held a Daubert hearing on my qualifications as an expert witness and issued a ruling concluding, “Mr. Kohlmann is certainly qualified to provide expert testimony... Mr. Kohlmann is qualified by means of his education, training, background, and experience to testify as an expert on terrorism... Mr. Kohlmann has conducted first-hand interviews of several leaders of terrorist organizations and has reviewed reams of information about al Qaeda... and the other subjects on which he will offer testimony. Indeed... it is apparent that these subjects are Mr. Kohlmann’s life work, and he has, therefore, acquired a considerable amount of information and documentation on these subjects... Mr. Kohlmann’s work receives a considerable amount of peer review from academic scholars and others, and by all accounts, Mr. Kohlmann’s work is well

regarded.”

11. Similarly, during United States v. Syed Haris Ahmed, Federal District Judge William S. Duffey Jr. held a Daubert hearing on my qualifications as an expert witness, and noted in his published ruling, “Kohlmann has developed an understanding of terrorist organization structures, operations, and membership, allowing him to speak with authority about Al-Qaeda in Iraq, Lashkar-e-Taiba, and Jaish-e-Mohammed. His research and experience have provided him a base of understanding far greater, and far more sophisticated, than of the Court or of jurors... A person lacking Kohlmann's advanced knowledge of JeM and LeT essentially would not be able to recognize the information on Khan's hard drive as information that might link a person to JeM or LeT.”

#### **I.) Research and Archival Methodology**

12. The methodology employed in formulating this report is derived from techniques taught to me by the late Dr. Joseph Lepgold, a senior faculty member from the Department of Government of the Edmund A. Walsh School of Foreign Service (SFS) at Georgetown University, as part of official coursework towards the completion of my Georgetown University Senior Honors Thesis, “The Legacy of the Arab-Afghans: A Case Study.”

13. Sources of research in the field of terrorism and terrorist organizations can loosely be divided into three sub-categories: primary sources, secondary sources, and tertiary sources.

14. Primary sources are generally considered to be the most credible and most

authentic sources of information for objective analysis. Examples of primary sources would be a face-to-face interview with the leader of a terrorist organization, an in-person visit to a training camp, or directly witnessing a terrorist attack. However, because international terrorist organizations are, by their very nature, secretive organizations which operate clandestinely, access to primary sources is rare and inconsistent. As such, frequently, terrorism analysts must instead turn to secondary sources in order to gain a deeper understanding of these groups.

15. Examples of secondary sources would be an original video or audio recording of a terrorist leader, published written communiqués, or an official magazine/website created by a terrorist organization. Secondary sources can occasionally be self-authenticating (i.e. a high-resolution video of an unmasked individual speaking) or can require deductive reasoning in order to determine their authenticity.

16. Beyond primary and secondary sources, there is one further category of research: tertiary sources. Examples of tertiary sources would be a newspaper article, a television news report, or a book or magazine published by a reputable third party. However, the information offered in tertiary sources often comes through a convoluted or unclear chain of custody, and thus I limit my own use of tertiary sources to add additional context to information already confirmed by primary or secondary sources.

17. In order to determine the provenance of particular secondary or tertiary sources, I engage in a traditional social science method known as "comparative analysis." This requires me to compare and contrast particular sources in question with other

analogous sources contained in my digital archive, searching for common threads and themes.

18. By drawing from a wide assortment of primary and secondary sources, I establish a single, objective narrative—while simultaneously noting any significant factual discrepancies or conflicting data.

19. During a May 2009 Daubert hearing before Judge William S. Duffey Jr. in the Northern District of Georgia, I explained the process of “comparative analysis” and how I rely upon it when making determinations of fact. This testimony was subsequently summarized by Judge Duffey in his own published ruling qualifying me as an expert:

“The basis for Kohlmann’s testimony, generally, is his years of research and tracking of terrorist information, through websites, primary interviews, books, news articles, and journals, and other information. His testimony essentially synthesizes these concepts, and through the use of the comparative analysis methodology, Kohlmann has developed an understanding of terrorist organization structures, operations, and membership... Kohlmann testified in detail regarding the methodology of comparative analysis, how it is relied upon by experts in social sciences, and how the particular information he gathers allows him to perform reliable analysis. He specifically testified to how he gathers and analyses information from primary, secondary, and tertiary sources, and he explained the difference between the sources and why and how he relies on each differently. He further explained how comparative analysis is performed, assimilating the relevant information and comparing and contrasting sources against one another to form a cohesive whole. The sources Kohlmann uses and the methodology he employs to analyze those sources, are identical to those used by other experts in his field. Kohlmann explained his methodology and how he used the methodology to arrive at his opinions in this case. The defendants did not offer any evidence at the hearing or subsequent to it to suggest that Kohlmann’s methodology is not sound or is not the same methodology typically relied upon by other social scientists... Mr. Kohlmann’s ability to synthesize that information through comparative analysis establishes his qualification as an expert.”

## II.) Analysis and Conclusions

20. In April 2010, I was requested by Plaintiffs' counsel to produce an affidavit documenting the role of Islamic charities in providing illicit financing to international terrorist organizations.

21. The roots of the modern Al-Qaida financial network that has emerged in the Balkans, the Caucasus, and other conflict zones across the Muslim world can be directly traced to early lessons learned during the chaotic days of the first Soviet-Afghan jihad.

22. As the 1980s drew to a close, thousands of Islamic fundamentalists arrived in Central Asia seeking heroic adventures amid "holy war," often with no local guide or requisite accommodations.

23. At the time, several wealthy Arabian Gulf charitable organizations, typically under the guise of aiding Afghan and Pakistani refugees, stepped forward to help channel the fanatical recruits where they were most needed.

24. These wealthy NGOs, sponsored by prominent Gulf businessmen, provided weapons, guesthouses, and travel papers to needy members of the quickly-coalescing Al-Qaida movement. Medical ambulances belonging to the Saudi Red Crescent and other fundamentalist-run relief groups were even diverted to bring Arab fighters back and forth from combat operations.<sup>1</sup>

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<sup>1</sup> Muhammad, Basil. Al-Ansar fi Afghanistan. The Committee for Islamic Benevolence Publications; ©1991. Page 187.



25. By clothing their militant activity with charitable ideals, Arab-Afghan leaders discovered that they were able to slip below the radar of many international intelligence agencies—but not all of them.

26. In 1996, a recently declassified U.S. government report—attributed by the Wall Street Journal to the Central Intelligence Agency (CIA)—alleged that “approximately one third of these Islamic NGOs support terrorist groups or employ individuals who are suspected of having terrorist connections.”<sup>2</sup>

27. The efficiency and success of the Afghan jihad financing model was quite an accomplishment for Usama Bin Laden and his international allies—so much so that operations continued even after the end of the Soviet-Afghan war and the expulsion of Bin Laden from the region.

28. Already by September 1992, evidence had emerged that the prolific terrorist financial and recruitment network that had emerged on the Afghan battlefield was indeed rapidly expanding to other conflict zones, including in Bosnia.

29. A 1996 American intelligence report alleged that “nearly one third of the Islamic NGOs in the Balkans have facilitated the activities of Islamic groups that engage in terrorism, including the Egyptian Al-Gama’at Al-Islamiyya, Palestinian Hamas, and Lebanese Hizballah.” The report added that “some of the terrorist groups, such as Al-Gama’at, have access to credentials for the UN High Commission for Refugees and other

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<sup>2</sup> January 1996 CIA Report on “International Islamic NGOs” and links to terrorism. Page 1. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). United States of America v. Soliman S. Biheiri. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

UN staffs in the former Yugoslavia.”<sup>3</sup>

30. According to a May 1995 classified internal memorandum from the (Muslim) Army of Bosnia-Herzegovina’s Military Security Service, the “financiers” of these charities were “mainly from Saudi Arabia, United Arab Emirates, and Kuwait” who operate “in secrecy without the knowledge of the official authorities of the countries that these persons came from, and it is done through the Swiss and some other European countries banks.”<sup>4</sup>

31. The Kingdom of Saudi Arabia was at the origin of much of this fundraising—and the financiers behind it.

32. A September 1994 internal memorandum from the Army of Bosnia-Herzegovina Security Service noted that the suspect behavior extended even to the official, state-funded charitable venture known as “the Saudi High Commission in Bosnia-Herzegovina”: “What is interesting regarding the humanitarian organization Saudi-Arabian High Commissariat in Zenica, is that they employ members of the El-Mujahidin Unit.”<sup>5</sup>

33. The ARBiH document added that “Salem H.A. Hamdi, director of the

<sup>3</sup> January 1996 CIA Report on “International Islamic NGOs” and links to terrorism. Page 1. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). *United States of America v. Soliman S. Biheiri*. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

<sup>4</sup> “Review of the Information on Activities of the Persons from Afro-Asian Countries Directly Before the War and During the War in the Territory of BiH Republic.” Report written by the BiH Administration of the Military Security Service—Department for Analytical and Informative Affairs.” Sarajevo; May 6, 1995.

<sup>5</sup> “Disruption of the enemy’s activities.” Memorandum dispatched from Zenica by Colonel Ramiz Dugalic, commander of the Ministry of Defense Security Administration—Republic of Bosnia and Herzegovina. Army of Bosnia and Herzegovina (ARBiH) Security Service Department. Classified No. 258-33. September 14, 1994.

High Saudi Arabian Commissariat... has well-established cooperation with... 'El-Mujahidin' units in Middle Bosnia."<sup>6</sup>

34. Bosnian Muslim military intelligence officials quickly grew concerned that "members of the 'El Mudzahedin' unit" seemed to "show less interest to participate in combat" and more of an effort to "impose the 'serijat' style of life to the Bosnians-Muslims in Zenica region, as well as practicing of religion in a way that has never been practiced by our people":<sup>7</sup>

"With their behavior and acting, the members of the 'El Mudzahedin' unit frequently violate current law regulations of our country and incidents are taking place every day, whose perpetrators are the members of this unit. Also, there are more frequent complaints of the citizens against the behavior of the unit's members, whereby they complain that they enter the houses and apartments by force and they intercept and physically mistreat the young people on the streets, trying to 'explain' to them that this is the land of Allah and that their behavior is not in the spirit with the 'serijat rules' and similar."<sup>8</sup>

#### **The International Islamic Relief Organization (IIRO)**

35. Among the groups singled out by the Bosnian Muslim Army for such provocative behavior was the Jeddah-based charity International Islamic Relief Organization (IIRO) (Hay'at al-Ighatha al-Islamiyya al-'Alamiyya), known locally as "Ighatha", "IGASA", or "IGASE."

<sup>6</sup> "Disruption of the enemy's activities." Memorandum dispatched from Zenica by Colonel Ramiz Dugalic, commander of the Ministry of Defense Security Administration Republic of Bosnia and Herzegovina. Army of Bosnia and Herzegovina (ARBiH) Security Service Department. Classified No. 258-33. September 14, 1994.

<sup>7</sup> "Review of the Information on Activities of the Persons from Afro-Asian Countries Directly Before the War and During the War in the Territory of BiH Republic." Report written by the BiH Administration of the Military Security Service- Department for Analytical and Informative Affairs." Sarajevo; May 6, 1995.

<sup>8</sup> "Review of the Information on Activities of the Persons from Afro-Asian Countries Directly Before the War and During the War in the Territory of BiH Republic." Report written by the BiH Administration of the Military Security Service- Department for Analytical and Informative Affairs." Sarajevo; May 6, 1995.

36. Founded in 1978, IIRO is a branch of the Muslim World League (MWL), a large state-funded Islamic missionary organization which promotes Muslim faith and activism around the world.

37. According to Dr. Farid Qurashi, IIRO's former "general supervisor," "IIRO was the first relief organization to enter Bosnia-Herzegovina and the Balkan region. From the very beginning of the Bosnia war, we were there to help."<sup>9</sup>

38. According to the Bosnian Muslim Army's Military Intelligence Service, IIRO's employees seemed to oddly "fluctuate... in and out of the humanitarian organization. They successively communicate with the members of the squad 'El-Mudzahidin' (Tesanj) and are the bearers of a so-called Pan-Arabian idea... They tend to change traditional living and religious norms of behavior of Bosnians-Moslems. This culminates through various reactions and confrontations, fights within the community."<sup>10</sup>

39. In an exclusive prison interview, former American mujahideen recruit Randall Todd Royer (a.k.a. Ismail Royer), who participated in the Bosnian jihad, acknowledged that IIRO's reputation was "well-known" in the Balkans: "it was well known that they helped get 'people' into Bosnia." Royer explained that another mujahideen fighter in Zenica had openly discussed his efforts to use IIRO in order to obtain identity cards for fellow jihadis.<sup>11</sup>

<sup>9</sup> "IIRO saves forty thousand Bosnians from starvation." Moneyclips. July 4, 1993.

<sup>10</sup> "Disruption of the enemy's activities." Memorandum dispatched from Zenica by Colonel Ramiz Dugalic, commander of the Ministry of Defense Security Administration Republic of Bosnia and Herzegovina. Army of Bosnia and Herzegovina (ARBiH) Security Service Department. Classified No. 258-33. September 14, 1994.

<sup>11</sup> Interview with Randall Todd Royer (a.k.a. "Ismail Royer") at the Alexandria Detention Center, Alexandria, VA. June 30, 2004.

40. A United Nations Security Council report noted that, in the summer of 1992, "troops from Saudi Arabia allegedly killed three Serbian Territorial Defence members and placed the victims' severed heads on poles near the 'Tesanj turret.'" <sup>12</sup> In September 1992, Balkan press agencies published photos depicting the severed heads of Serb soldiers killed by foreign mujahideen collected in boxes. The photos had been seized from the belongings of fallen Saudi Arabian nationals fighting with local Muslim forces in July and August near Tesanj. Also confiscated alongside the images were business cards for companies in the Persian Gulf and an IIRO humanitarian worker identification card. The recovered card was labeled with the name and photo of "Khalil Abdel Aziz," a teacher from Saudi Arabia, and indicated that it had been printed by the Peshawar, Pakistan office of IIRO. <sup>13</sup>

41. By mid-1993, the operations of the International Islamic Relief Organization in Bosnia-Herzegovina were under the primary oversight of a Palestinian national known as Abdelaziz Zaher (a.k.a. Abu Anas, Abu Enes) and his deputy, an Algerian national, Djamel Lamrani (a.k.a. Abu Musab al-Djazairi).

42. Zaher was expelled from his former residence in Belgrade at the beginning of 1993 after being tied by Serbian authorities to various organizations suspected of aiding armed fundamentalist militant groups, including IIRO. <sup>14</sup> In the aftermath of his

<sup>12</sup> Final Report of the United Nations Commission of Experts Established Pursuant to Security Council Resolution 780 (1992): Annex III.A: Special Forces. May 27, 1994. EX: 0027-7184-0027-7441.

<sup>13</sup> Compass Newswire, November 1, 1995. See also: Emerson, Steven. "An Investigation into the Modus Operandi of Terrorist Networks in the United States: The Structure of Osama Bin Laden, Al-Qaeda, Hamas and other Jihadist Organizations in the United States." Testimony given before the House Subcommittee on National Security, Veterans Affairs and International Relations of the House Committee on Government Reform. October 11, 2001.

<sup>14</sup> Vujicic, D. "Bombs in the Name of the Almighty: Part II." Vecernje Novosti (Belgrade). September 27, 2001. Page 13.

expulsion from Yugoslavia, Zaher moved his base of operations to Vienna and Zagreb.<sup>15</sup>

43. One the IIRO's initial management team in Vienna in 1992, Sukarno Ali Hassanein (brother of Third World Relief Agency [TWRA] chief El Fatih Hassanein) recalled during a later interview with Austrian police, "I know him as Zaher Abdelaziz, [he] works for IGASA/IIRO. He might be the boss for Vienna or Zagreb. He is one of our successors at IGASA." As to what he meant by "successors", Sukarno explained, "we haven't been representing this organization for a year and half already since the Main Office in Saudi Arabia sent their own people to Vienna."<sup>16</sup>

44. IIRO's regional director Abdelaziz Zaher was an eyewitness, and a possible accessory to, the 1994 murder of British aid worker Paul Goodall near Zenica—acknowledged by the Bosnian Muslim Army at the time as "one of the most serious incidents caused by the members of the [El-Mujahidin] unit."<sup>17</sup>

45. On January 27, 1994, three Britons—Simon King, David Court, and Paul Goodall—working for their government's Overseas Development Administration (ODA), were traveling through Zenica at night in a UN-marked Land Rover. After being suddenly chased and forced off the road, five Arabic-speaking "bearded gunmen" in combat fatigues quickly alighted from a Volkswagen Golf. Instead of holding the Westerners hostage, their assailants confiscated their coats and wallets, and forced them

<sup>15</sup> According to a report from the Bosnian MUP police service, "In those days", four other individuals were known to work alongside Zaher in the IIRO's regional headquarters: Saudi national Dr. Abdala Alabdan, "Abdalin", Palestinian national Muhamed Salah, and Syrian national Mustafa Hamami. See: "Subject: ABDEL RAHMAN MAMDOUH – Operative Data." Internal memorandum from the BiH FMUP Special Detachment, Department for the Tuzla Canton; #12/2-3-356/04. Dated: April 5, 2005.

<sup>16</sup> Minutes of Austrian police interview with Sukarno Ali Hassanein following search of premises belonging to El Fatih Hassanein. September 5, 1995.

<sup>17</sup> "Review of the Information on Activities of the Persons from Afro-Asian Countries Directly Before the War and During the War in the Territory of BiH Republic." Report written by the BiH Administration of the Military Security Service—Department for Analytical and Informative Affairs." Sarajevo; May 6, 1995.

to lie on the ground. Within twenty minutes, another unidentified car arrived with two more gunmen. After a "short discussion," one of the men suddenly turned and shot Paul Goodall twice at short range in the back of his head.<sup>18</sup>

46. A Bosnian police checkpoint near the crime scene noticed the Volkswagen Golf as it later passed by and marked its license number. Two days later, local authorities located the Golf and arrested three men inside: Saudi national Abdul Hadi al-Qahtani (a.k.a. Abdul Hadi al-Gahtani), "Abu Khulud al-Yemeni", and "Abu Enes" (a.k.a. IIRO chief Abdelaziz Zaher). At the time of his arrest, al-Qahtani was carrying an identification card issued by the Zenica office of the Saudi High Commission for Relief.<sup>19</sup> Dzermaludin Mutapcic, the deputy prosecutor of Zenica, announced to reporters that al-Qahtani had come to Bosnia "to fight in the way of God, to save Bosnia's Muslims."<sup>20</sup>

47. When shown a photograph of al-Qahtani, both King and Court allegedly identified him as the lead assailant behind the murder of Paul Goodall.<sup>21</sup> Asim Fazlic, then-chief of police in Zenica, commented, "One of the strangest elements is that we still do not know the exact identity of [those]... we hold in Zenica. They are very uncooperative and so far still insist, in spite of their car, uniform and weapons, that they are humanitarian aid workers helping privately funded organizations."<sup>22</sup>

48. In a letter dated January 30, 1994, deputy commander Dr. Abul-Harith al-

<sup>18</sup> Stephen, Chris. "Shots First then the Questions." *The Guardian* (London), June 16, 1994. Page T4.

<sup>19</sup> Higgins, Andrew et al. "Assault on Charities is Risky Front for U.S." *The Wall Street Journal*. October 16, 2001.

<sup>20</sup> Stephen, Chris. "No Justice over Murdered British Aid Worker as Suspect Languishes Behind Prison Bars." *The Guardian* (London), March 23, 1994. Page 1.

<sup>21</sup> Stephen, Chris. "No Justice over Murdered British Aid Worker as Suspect Languishes Behind Prison Bars." *The Guardian* (London), March 23, 1994. Page 1.

<sup>22</sup> Loyd, Anthony. "3 held for Goodall murder." *The Times* (London). February 2, 1994.

Liby appealed to "authorized individuals" in the BiH Military Police and security services to release the two "mujahideen" arrested alongside Abdulhadi al-Qahtani:

"We came to Zenica together on Friday [January 28] of this year and spent the whole day in Trokuce, i.e. in the Command of the Detachment. In the evening of the same day [January 28] these two Mujahedins left, together with Abdulhadi Alkahtani, [a] person who was in our unit until one month ago, when he left the unit and went to work at the Saudi Organisation 'IGASE.' However, [Al-Qahtani] continued to visit our premises, just like this Friday... [On] Friday evening him and the two Mujahedins (Abu Hulud and Abu Enes) went towards Mehuric in a vehicle owned by a brother from 'IGASE.' Therefore, I confirm that these two brothers Mujahedins have nothing to do with the event that happened on [January 27]... I am personally responsible for them and their actions... In the name of all the Mujahedins, I request the two Mujahedins to be released... We want complete co-operation with the authorised organs for establishing peace and order in the Republic of Bosnia and Herzegovina... [which] will be held responsible in case of ill-treatment of brothers Mujahedins."<sup>23</sup>

49. It should be noted that, in his letter, the deputy commander of the mujahideen identified both "Abu Enes" (Zaher) and his colleague Abdulhadi al-Qahtani interchangeably as "mujahideen" and as "employees" of IIRO ("IGASE"), who were detained by BiH authorities while traveling in an IIRO employee-owned vehicle.

50. Following the end of the war in Bosnia-Herzegovina in late 1995, Abdelaziz Zaher and IIRO continued their operations in the Balkans. The same year, "with the financial help of Selim Ben Mafuz, the executive director of 'Igasa' in Vienna", Zaher and other local IIRO organizers founded two commercial enterprises, "Sahara" and "Isra-Trade" which allegedly were the recipient of suspicious financial transfers from

<sup>23</sup> Letter from Dr. Abul-Harith al-Liby. Dated: January 30, 1994. *International Prosecutors v. Rasim Delic*, International Criminal Tribunal for the Former Yugoslavia (ICTFY). Exhibit 0403-3847-0403-3847.



“residential accounts of the H.O. ‘Igasa.’”<sup>24</sup>

51. International law enforcement and intelligence investigations of IIRO’s mission in the Balkans continued as well. According to a guidebook on Islamic charitable organizations printed by NATO, in April 1995, “the regional financial accountant for the IIRO, an Egyptian named Hossam Meawad Mohammad Ali, was detained by Croatian authorities in a raid in Zagreb” for his involvement in alleged criminal activity.<sup>25</sup>

52. During subsequent testimony before the Pentagon’s Administrative Review Board, Guantanamo Bay detainees have made a number of references to their involvement in IIRO—such as a Saudi national from Dammam who identified himself as a “a [Saudi] government employee of a charitable organization... the IIRO, International Islam Relief Organization” and insisted that Al-Qaida’s Al-Farouq training camp in Afghanistan—where at least seven of the 9/11 suicide hijackers were trained—was a “charity-funded camp.”<sup>26</sup> Another detainee—an unnamed Algerian who “voluntarily traveled from Mauritania, Africa to Islamabad, Pakistan in 1987 to work for [IIRO]”—likewise admits that he “received weapons training on the Kalashnikov rifle while working for the IRO... near the border town of Peshawar.”<sup>27</sup>

- **Al-Muwafaq Foundation**

<sup>24</sup> “Subject: ABDEL RAHMAN MAMDOUH – Operative Data.” Internal memorandum from the BiH FMUP Special Detachment, Department for the Tuzla Canton; #12/2-3-356/04. Dated: April 5, 2005.

<sup>25</sup> January 1996 CIA Report on “International Islamic NGOs” and links to terrorism. Page 1. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). *United States of America v. Soliman S. Biheiri*. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

<sup>26</sup> Set\_44\_2922-3064. Pages 103-104.

<sup>27</sup> Set\_12\_1179-1239. Page 16.

53. The Saudi-based Al-Muwafaq Foundation, headed by businessman and philanthropist Yasin Abdullah al-Qadi, was another notable, well-funded, and influential NGO providing aid to the Arab mujahideen.<sup>28</sup>

54. The “members of the governing Council and the trustees of the assets” of Al-Muwafaq include, among others, Yasin al-Qadi and Abdulrahman bin Mahfouz, a son of Saudi businessman Khalid bin Mahfouz.<sup>29</sup> In an interview with As-Sharq al-Awsat, al-Qadi explained that Al-Muwafaq was originally conceived by a collection of wealthy Saudis who wanted to aid “disaster-stricken Muslim brothers in several areas of conflict.”

55. An October 28, 2001 report in the Chicago Tribune, based in part on an interview of Al-Qadi, stated that Al-Qadi ran Muwafaq “from 1992 to roughly 1997, drawing some \$15 million to \$20 million from his fortune and contributions from his wealthy colleagues.”<sup>30</sup>

56. Abdulrahman bin Mahfouz told Forbes Magazine that Al-Muwafaq was the brainchild of his father, who financed it with up to \$30 million.<sup>31</sup> In 1999, USA Today reported that a Saudi government audit had found that National Commercial Bank (NCB) — a Jiddah, Saudi Arabia-based bank controlled at the time by Khalid bin Mahfouz and members of his family — had transferred \$3 million to Islamic charities funding terrorism, including Al-Muwafaq.

<sup>28</sup> “Muwafaq Foundation.” State of Delaware Certificate of Incorporation. February 3, 1992.

<sup>29</sup> Writ dated August 8, 1995 in the High Court of Justice, Queen’s Bench Division. In the matter of Yassin Quadi et al v. Blackwell Publishers Limited and Patrick Smith. See also: “The World’s Billionaires.” Forbes Magazine. March 18, 2002.

<sup>30</sup> Chicago Tribune. October 28, 2001.

<sup>31</sup> Mudry, Brent. “M.I.T.’s bin Mahfouz backers an intriguing family too.” Canada Stockwatch. March 8, 2002.

57. Following the outbreak of the conflict in Bosnia-Herzegovina in early 1992, Al-Muwafaq expanded its operations and opened a regional bureau affiliated with the "Croatian Islamic Center."<sup>32</sup>

58. After firing the initial head of the Bosnian Al-Muwafaq office, Qadi and his associates then needed to fill the vacancy.

59. Wael Jalaidan, an old friend and battlefield comrade of Usama Bin Laden in Afghanistan<sup>33</sup>, nominated Chafiq bin Muhammad Ayadi, a veteran Tunisian Arab-Afghan guerilla, for the post.<sup>34</sup>

60. On October 12, 2002, the U.S. Treasury Department officially named both Yasin al-Qadi and Chafiq Ayadi as Specially Designated Global Terrorists (SDGT), and ordered that their personal assets be frozen.<sup>35</sup>

61. According to a Treasury Department press release, al-Qadi "heads the Saudi-based Muwafaq Foundation. Muwafaq is an al-Qaeda front that receives funding from wealthy Saudi businessmen... Saudi businessmen have been transferring millions of

<sup>32</sup> "Saudi Businessman Al-Qadi Rules Out Suspect Ayadi's Link to al-Qa'ida," Al-Sharq al-Awsat (London), October 23, 2001. Page 6.

<sup>33</sup> In a 1999 interview with Qatar-based Al-Jazeera television, Usama Bin Laden warmly recalled the early days fighting in Afghanistan alongside Jalaidan, "We were all in one boat, as is known to you, including our brother, Wa'el Jalaidan." Likewise, in the spring of 2000, U.S. officials sent a confidential memorandum to UN police forces in southeastern Europe warning that Jalaidan was acting as an associate of Usama Bin Laden and had directly assisted Bin Laden "move money and men to and from the Balkans." See: Office of Public Affairs, United States Treasury Department. "Treasury Department Statement on the Designation of Wa'el Hamza Julidan." September 6, 2002. Document #PO-3397. See also: News report by British Broadcasting Company (BBC). April 3, 2000.

<sup>34</sup> "Saudi Businessman Al-Qadi Rules Out Suspect Ayadi's Link to al-Qa'ida," Al-Sharq al-Awsat (London), October 23, 2001. Page 6.

<sup>35</sup> The Office of Public Affairs, U.S. Department of Treasury. "Treasury Department Releases List of 39 Additional Specially Designated Global Terrorists." Press release dated October 12, 2001.

dollars to Bin Laden through [Al-Muwafaq].”<sup>36</sup> Chafiq Ayadi “is connected to the bin Laden financial network through the Mouwafaq Foundation in Munich, Germany.”<sup>37</sup>

62. Wael Jalaidan had first met Ayadi in Pakistan, shortly after Ayadi was treated in Saudi Arabia for combat wounds suffered in Afghanistan.

63. Upon his return to the region, Ayadi began working for the Muslim World League under the direct tutelage of Jalaidan.

64. In 1993, Ayadi suddenly asked his boss to help him find a new job in the European offices of any amenable Islamic charitable group. Jalaidan, aware of the vacancy at the Al-Muwafaq office, asked al-Qadi (a close family friend) to hire Ayadi.

65. In July 1996, Yasin al-Qadi even registered his shares owned in the local Depozitna Banka in several names, including that of Chafiq Ayadi.<sup>38</sup>

66. According to al-Qadi:

“Julaydan’s nomination of Ayadi was not wrong... I can say that he is one of the best people I have worked with in charitable activities. During his work, he managed to provide great services to Bosnian Muslims. In addition, he won the confidence of government officials, led by the then Bosnian President Alija Izetbegovic and members of his government. On many occasions, Ayadi was the main link between the Saudi Standing Committee for the Collection of Donations for Bosnia-Herzegovina and needy people there.”<sup>39</sup>

67. According to the U.S. Treasury Department, following his arrival in the

<sup>36</sup> The Office of Public Affairs, U.S. Department of Treasury. “Entities.” Press release dated October 12, 2001.

<sup>37</sup> The Office of Public Affairs, U.S. Department of Treasury. “Entities.” Press release dated October 12, 2001.

<sup>38</sup> “Saudi Businessman Al-Qadi Rules Out Suspect Ayadi’s Link to al-Qa’ida.” Al-Sharq al-Awsat (London). October 23, 2001. Page 6.

<sup>39</sup> “Saudi Businessman Al-Qadi Rules Out Suspect Ayadi’s Link to al-Qa’ida.” Al-Sharq al-Awsat (London). October 23, 2001. Page 6.

Balkans, Ayadi worked on behalf of the Tunisian An-Nahdah Movement "under the cover of a humanitarian organization. He used funds to buy weapons and false documents for terrorist activities."<sup>40</sup>

68. According to a 2001 memorandum from former U.S. Department of Treasury General Counsel David D. Aufhauser:

"Muhammad Ali Harrath, main activist of the Tunisian Islamic Front (TIF) in the United Kingdom, was associated with Muwafaq personnel in Bosnia and other TIF members worked at the Muwafaq Foundation. Syrian citizen Mahmoud Mehdi, once director of the Muwafaq Foundation in Pakistan, was a member of Al-Qaida and the Al-Faran terrorist group... Following the arrest of Ramzi Yusif in 1995, the Pakistani police reportedly raided Muwafaq's offices and held its local director in custody for several months. The Muwafaq Foundation also provided support to HAMAS and the Abu Sayyaf Organization in the Philippines. The Muwafaq Foundation also employed or served as cover for Islamic extremists connected with the military activities of Makhtab al-Khidamat (MK), which has been partially financed by the Muwafaq Foundation. The Muwafaq Foundation supplied identity cards and employment as cover for some Arabs to allow them to obtain visas to remain in Pakistan."<sup>41</sup>

69. A former senior official of the Mujahideen Brigade in Bosnia-Herzegovina, Syrian national Aiman Awad (a.k.a. Abu Ayman"), has testified under oath regarding the role of Al-Muwafaq in providing a support conduit to mujahideen fighters in the Balkans.

70. Fluent in Arabic and local Balkan languages, Awad quickly rose through the ranks, eventually assuming a position akin to "intelligence director" for the Mujahideen Brigade. A May 1995 internal memorandum from the Military Security

<sup>40</sup> "Subject: Designation Pursuant to E.O. 13224; Memorandum for R. Richard Newcomb, Director, Office of Foreign Assets Control." Author: Mark D. Roberts, Chief, Foreign Terrorist Programs Division.

<sup>41</sup> Letter from U.S. Department of Treasury General Counsel David D. Aufhauser to M. Claude Nicati, Substitut du Procureur General, Switzerland. Dated: November 29, 2001.

Service of the Muslim Army of Bosnia-Herzegovina noted, "We have reliable information that the transactions of the goods through the humanitarian organizations from Saudi Arabia are exclusively conducted by Aiman [Awad]." <sup>42</sup>

71. During later testimony before the International Criminal Tribunal for the Former Yugoslavia, Awad recounted how he had first joined the mujahideen through the auspices of Yassin al-Qadi's charity Al-Muwafaq:

"In late 1992, I joined the Mowafaq Foundation... and that is the organization I was a member of when I entered Bosnia and Herzegovina... I wanted to come to Bosnia to fight, and then I thought I could use that opportunity and help with translation... So to help with translation, interpreting, and also help in fighting in Bosnia and Herzegovina... I joined the organization, the Mowafaq foundation, thinking that they were organizing training for soldiers in Bosnia and Herzegovina... When I was asked by the director of the humanitarian organization, the Mowafaq Foundation, who wanted to enter Bosnia or who wanted to go to Bosnia, to be there, and he said that there was a possibility for that, I used that option, and I entered Bosnia and Herzegovina at the expense of the humanitarian organization that I was working for... I was receiving a salary at this organization... [Y]assin al Kadi perhaps was the founder or the owner. In any case, I did hear of that, yes... [Chafiq Ayadi] was my director." <sup>43</sup>

72. A senior leader of the Egyptian terror group Al-Gama'at al-Islamiyya, Talaat Fouad Qassem (a.k.a. Abu Talal al-Qasimy) has also acknowledged that Al-Muwafaq "provided logistical and financial support for a mujahidin battalion in Bosnia." <sup>44</sup>

73. At the end of the Bosnian war in 1995, several foreign relief agencies

<sup>42</sup> "Review of the Information on Activities of the Persons from Afro-Asian Countries Directly Before the War and During the War in the Territory of BIH Republic." Report written by the BIH Administration of the Military Security Service—Department for Analytical and Informative Affairs." Sarajevo, May 6, 1995.

<sup>43</sup> Trial Transcript, Feb. 8 and Feb. 10, 2008. *International Prosecutor v. Rasim Delic*, International Criminal Tribunal for the Former Yugoslavia (ICTFY). <http://www.un.org/icty/transe83/080208IT.htm>, <http://www.un.org/icty/transe83/080210IT.htm>.

<sup>44</sup> Letter from U.S. Department of Treasury General Counsel David D. Aufhauser to M. Claude Nicati, Substitut du Procureur General, Switzerland. Dated: November 29, 2001.

closed their local offices, including Al-Muwafaq. Yasin al-Qadi then helped arrange a substitute banking job for Ayadi at Depozitna Banka. Chafiq Ayadi proceeded to use his position at Depozitna Banka as a cover to facilitate assorted "dubious" financial transactions involving accounts controlled by Al-Muwafaq, "Euroinvest" (an investment corporation co-owned by Wael Jalaidan and Yasin al-Qadi), and other unidentified companies in Saudi Arabia. During this time, Ayadi was also investigated by Bosnian authorities in connection with cigarette smuggling, reselling stolen humanitarian goods, and laundering money to fund terrorist activities.<sup>45</sup>

74. Following two years working at Depozitna, the bank management suddenly fired Chafiq Ayadi. Soheyl Siddiqi, the bank's general manager, clarified, "[d]ue to the fact that he had a high-school diploma... we could not benefit from him as required."<sup>46</sup>

75. Since leaving his positions at Al-Muwafaq and Depozitna Banka, Chafiq Ayadi has continued to surface in new money laundering and terrorist finance investigations. In at least one other unnamed location, according to the U.S. government, "Ayadi is recorded in their country on suspicion of collecting funds for the Afghan regime and the Taliban fighters."<sup>47</sup>

### **Third World Relief Agency (TWRA)**

76. The Third World Relief Agency (TWRA), founded in 1987 in Vienna,

<sup>45</sup> Hadziomerovic, Bakir. Bosnia-Herzegovina Federation TV broadcast in Bosnian/Croatian/Serbian from Sarajevo. February 10, 2003; 1900GMT.

<sup>46</sup> "Saudi Businessman Al-Qadi Rules Out Suspect Ayadi's Link to al-Qa'ida." Al-Sharq al-Awsat (London). October 23, 2001. Page 6.

<sup>47</sup> "Subject: Designation Pursuant to E.O. 13224; Memorandum for R. Richard Newcomb, Director, Office of Foreign Assets Control." Author: Mark D. Roberts, Chief, Foreign Terrorist Programs Division.

Austria (with additional offices in Khartoum, Sarajevo, Budapest, Moscow and Istanbul) also quickly became a notorious financier of—and arms broker for—irregular Muslim soldiers and mujahideen in Bosnia, in direct violation of an international arms embargo.

77. According to Western intelligence officials, at least half of the \$350 million collected by TWRA was used primarily to purchase and transport illegal weapons on behalf of the Bosnian government and allied Muslim fighters. Quite frequently, these funds were quietly laundered through anonymous European bank accounts in Liechtenstein and Monaco.<sup>48</sup>

78. According to an official NATO/SFOR guidebook to “The Islamic Organizations in the Balkans”, “from 1992, TWRA helped to collect money from Muslim countries and provided assistance, including weapons, to the Bosnian Muslims... Along with the Saudi High Commission for Relief it was one of the largest sources of external humanitarian aid to the Bosnian Muslims.”<sup>49</sup>

79. The guidebook also reports that TWRA “employed former mujahidin” and organized actual covert arms shipments: “In July 1993 a TWRA-sponsored cargo plane was stopped at Maribor airport, in Slovenia, and found to have weapons for the Bosnian Muslims on board.”<sup>50</sup> As a result, in September 1995, Austrian police finally raided and shut down TWRA’s regional headquarters in Vienna. Their subsequent criminal inquiry uncovered dozens of records and receipts for the illicit purchase of weapons, ammunition,

<sup>48</sup> Pomfret, John. “How Bosnia’s Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups.” *The Washington Post*. September 22, 1996; Page A01.

<sup>49</sup> “Islamic Organizations in the Balkans.” A Joint Research Project by the Governments of the United States and the United Kingdom. August 2003.

<sup>50</sup> “Islamic Organizations in the Balkans.” A Joint Research Project by the Governments of the United States and the United Kingdom. August 2003.



military uniforms, and other various accessories, all financed by TWRA "charitable" contributions and destined for the Muslim-led Army of Bosnia-Herzegovina.

80. TWRA was founded and managed primarily by Mohammed el-Fatih Hassanein, a well-connected leader of the Sudanese National Islamic Front (NIF) party. As Sudanese cultural attaché in Vienna starting in March 1992, Hassanein was unofficially responsible for supervising NIF fundamentalist foreign policy in Eastern Europe. He explained in 1994 magazine interview that the Bosnian civil war was not just about bringing peace or repelling a hostile invader; rather, he argued, "Bosnia, at the end, must be Muslim Bosnia." If not, "everything has lost its sense and this war was for nothing."<sup>51</sup>

81. Given their common roots in Vienna under the shared oversight of the Hassanein brothers, the Balkan operations of TWRA and, conversely, the International Islamic Relief Organization (IIRO) were often closely intertwined.

82. The 1996 U.S. intelligence report on Islamic charities stated that Hassanein, considered "the most influential NGO official in Bosnia," also "supports US Muslim extremists in Bosnia."<sup>52</sup>

83. During the 1995 trial of conspirators charged with involvement in a terrorist plot to attack landmarks in New York, Clement Rodney Hampton-el, an

<sup>51</sup> Pomfret, John. "How Bosnia's Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups." The Washington Post. September 22, 1996; Page A01.

<sup>52</sup> January 1996 CIA Report on "International Islamic NGOs" and links to terrorism. Page 13. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). United States of America v. Soliman S. Biheiri. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

American Muslim who trained in the Afghan camps run by Al-Qaida, confirmed that he had been smuggling money into the United States obtained from the Third World Relief Agency for the purpose of financing the military training in New York, Connecticut, and Pennsylvania of Arab-Afghan mujahideen destined for Bosnia.<sup>53</sup>

84. Graduates of these makeshift camps included relatives and associates of those responsible for the 1993 bombing of the World Trade Center in New York.

85. The government of Saudi Arabia was the single largest donor to TWRA. Accounting ledgers seized by Austrian police and prosecutors show lists of large financial transfers from among others, Saudi Prince Salman bin Abdelaziz. In October 1992, in one instance alone, a KSA royal emissary arrived suddenly at TWRA's bank in Vienna clutching two large suitcases filled with \$5 million in cash.<sup>54</sup>

86. According to an official analysis of seized bank records by Austrian police, TWRA was the recipient of large financial transfers from "Abdul Elah Salem bin Mahfouz", son of Khalid Bin Mahfouz: "On 10/27/1992 one Abdul Elah Salem BIN MAHFOUZ transferred an amount of 133,321.72 USD to the examined account. The National Commercial Bank, Jeddah is entered as the ordering and Account-holding bank."

87. Usama Bin Laden, himself, is believed to have donated large sums of money to TWRA to finance the purchase of weapons on behalf of the Bosnian Muslim

<sup>53</sup> Sworn affidavit of FBI Special Agent Robert Walker. United States of America v. Benevolence International Foundation, Inc. April 29, 2002. District of Illinois, Eastern Division. Case number: 02CR0414. Page 6.

<sup>54</sup> Pomfret, John. "How Bosnia's Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups." The Washington Post. September 22 1996; Page A01.

government.<sup>55</sup>

88. In April 1995, when Croatian authorities arrested and searched an Algerian envoy of the Al-Kifah Refugee Center, they discovered "passports of Arab individuals in Bosnia, including an employee of the Third World Relief Agency."<sup>56</sup> Similarly, when Croat gunmen shot and killed five foreign mujahideen (including wanted members of Al-Gama'at Al-Islamiyya) outside of the town of Zepce on December 14, 1995, one of the slain suspects (Egyptian commander Anwar Shaaban) was carrying a Third World Relief Agency identification card.<sup>57</sup>

89. In secret recordings of conversations between convicted terrorist Shaykh Omar Abdel Rahman and Third World Relief Agency's office in Vienna, the relief agency volunteered to spread the message of Al-Gama'at Al-Islamiyya, and sell the Shaykh's militant videotapes and sermons in mosques throughout Europe.<sup>58</sup> Faxes from TWRA under the name of the Austrian Office "General Director," Mohammed el-Fatih Hassanein, were found during the Italian investigation of Shaykh Anwar Shaaban's Islamic Cultural Institute in Milan.<sup>59</sup> According to the CIA, even after the end of the Bosnian war, TWRA director Hassanein had intended "to resume funding Al-Gama'at

<sup>55</sup> Pomfret, John. "Bosnian Officials Involved in Arms Trade Tied to Radical States." The Washington Post. September 22, 1996. Page A26.

<sup>56</sup> January 1996 CIA Report on "International Islamic NGOs" and links to terrorism. Page 10. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). United States of America v. Soliman S. Biheiri. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

<sup>57</sup> Pomfret, John. "Bosnian Officials Involved in Arms Trade Tied to Radical States." The Washington Post. September 22, 1996. Page A26.

<sup>58</sup> Pomfret, John. "Bosnian Officials Involved in Arms Trade Tied to Radical States." The Washington Post. September 22, 1996. Page A26.

<sup>59</sup> Italian Division of General Investigations and Special Operations (DIGOS) Anti-Terrorism Report. "Searches at the Islamic Cultural Center, Viale Jenner 50, Milano, 6/26/1995." Dated September 15, 1997.

[al-Islamiyya] and other extremists in Milan and Rome [once] the network was rebuilt.”<sup>60</sup>

90. On October 20, 1995, a massive explosion shook the quiet Croatian port town of Rijeka just before noon when a suicide attacker detonated a car bomb outside the Primorje-Gorani county police headquarters, wounding dozens, including two seriously.<sup>61</sup> The bomb was powerful enough to destroy the police headquarters and damage several nearby buildings, including a Zagreb Bank branch and a primary school.<sup>62</sup> At a press conference hastily organized by the authorities, the Croatian Interior Minister, Ivan Janjakk, stated that the bombing was regarded as a “serious terror attack.”<sup>63</sup>

91. According to the CIA, the suicide bomber in Rijeka was “a member of Al-Gama’at [al-Islamiyya]” and a known employee of the notorious Third World Relief Agency (TWRA).<sup>64</sup> The NATO guidebook “Islamic Organizations of the Balkans” confirms that not only was the Rijeka bomber a “Bosnian representative of TWRA”, but moreover, “the car was also registered to TWRA.”<sup>65</sup>

92. TWRA was also involved in the direct procurement and transportation of

<sup>60</sup> January 1996 CIA Report on “International Islamic NGOs” and links to terrorism. Page 13. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). *United States of America v. Soliman S. Biheiri*. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

<sup>61</sup> Croatian Radio. Broadcast in Serbo-Croat language in Zagreb. October 20, 1995; 1600 GMT. See also: Gatti, Fabrizio. “1995: From Milan a car bomb leaves for Fiume.” *Corriere della Sera* (Italy). November 11, 2001.

<sup>62</sup> Croatian Radio. Broadcast in Serbo-Croat language in Zagreb. October 20, 1995; 1600 GMT.

<sup>63</sup> “Car-bomb rocks Croatian city.” *The Independent* (London). October 21, 1995. Page 13.

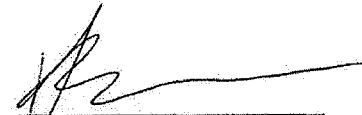
<sup>64</sup> Gatti, Fabrizio. “1995: From Milan a car bomb leaves for Fiume.” *Corriere della Sera* (Italy). November 11, 2001. See also: January 1996 CIA Report on “International Islamic NGOs” and links to terrorism. Page 13. See also: Affidavit by Senior Special Agent David Kane (Bureau of Immigration and Customs Enforcement, Department of Homeland Security). *United States of America v. Soliman S. Biheiri*. United States District Court for the Eastern District of Virginia, Alexandria Division. Case #: 03-365-A. August 14, 2003. Page 2.

<sup>65</sup> “Islamic Organizations in the Balkans.” A Joint Research Project by the Governments of the United States and the United Kingdom. August 2003.

weapons primarily from Sudan and the former Soviet Union directly to the Bosnian frontline.

93. In September 1992, Western intelligence officials learned of a major ongoing project of the relief agency to ship 120 tons of Soviet-made assault rifles, mortars, mines, and ammunition via Sudan and Slovenia to Muslim forces in Bosnia. After Soviet-built transport planes deposited the arms in a Slovenian warehouse leased by TWRA, chartered helicopters provided by a joint Russian-American venture called "Eco-Trends" shuttled the weapons from the warehouse through Croatia directly to Tuzla and Zenica.<sup>66</sup>

94. After a year-long investigation, Slovenian officials finally raided the dormant warehouse, discovering 10,000 assault rifles, 750,000 rounds of ammunition, and various rockets and explosives valued at about a total of \$10 million.<sup>67</sup> In 1993, German police uncovered another arms smuggling operation worth \$15 million financed by TWRA.<sup>68</sup>

  
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Executed on April 22, 2010 in New York, New York.

<sup>66</sup> Pomfret, John. "How Bosnia's Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups." The Washington Post. September 22 1996; Page A01.

<sup>67</sup> Pomfret, John. "How Bosnia's Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups." The Washington Post. September 22 1996; Page A01.

<sup>68</sup> Pomfret, John. "How Bosnia's Muslims Dodged Arms Embargo: Relief Agency Brokered Aid From Nations, Radical Groups." The Washington Post. September 22 1996; Page A01.